

**Remarks**

Claims 4-7, 13 and 22 have been amended. Claim 27 is new. Claims 1-3 and 24-26 have been withdrawn. Applicants respectfully submits that no new matter was added by the amendment, as all of the amended matter was either previously illustrated or described in the drawings, written specification and/or claims of the present application. Thus, claims 4-23 and 27 remain pending in this application. It is respectfully submitted that based on the following remarks, all of the presently pending claims are in condition for allowance.

**Objection to the Specification**

The specification is objected to for failing to provide proper antecedent basis for the claimed subject matter. (See 12/02/09 Office Action p. 3). Contrary to the Examiner's assertion, the specification does provide a proper antecedent basis for claim 13. Page 6, lines, 1-18, teach that bolts 25 are tightened, which causes the first connecting piece 5 to raise itself from the surface 7 of the hub. Although the description does not use the exact wording as used claim 13 in referring to the release of the adherence, it is implicit that the release of connecting piece 5 (in the lower region in which the cavity 19 contains the cement-like substance) from the surface 7, must release the adherence of the cement-like structure. It is obvious to one of ordinary skill in the art that this teaches the limitation of claim 13. However, to overcome this

objection, Applicant has amended the specification to include the limitation recited in claim 13. The amendment does not add new matter to the specification.

Objections to the Claims

Claim 13 stands objected to because it lacks the proper antecedent basis. (See 12/02/09 Office Action p. 3). Claim 13 has been amended to overcome the objection.

Rejection under 35 U.S.C § 112

Claim 13 stands rejected under 35 U.S.C. § 112, first paragraph, for failing to comply with the enabling requirement. As stated above, antecedent basis for this claim can be found on page 6, lines 1-18. However, Applicant has amended the specification to more explicitly recite a proper antecedent basis. Therefore, Applicant submits that the 35 U.S.C. § 112 rejection should be withdrawn.

Claims 5-23 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. (See 12/02/09 Office Action p. 4). Claim 5 has been amended to delete the term “preferably bolts.” Claim 22 has been amended to recite, “less dense than steel.” Therefore, Applicant submits that claims 5 and 22 are now in condition for allowance. Because claims 6-23 depend from, and therefore include all the limitations of claim 5, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 5.

Rejections Under 35 U.S.C. § 102(b)

Claims 4-6, 8, 10-12 and 15-27 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Publication No. 2002/0112441 to Bissen (hereinafter "Bissen"). (See 12/02/09 Office Action p. 5).

The Examiner relies on Bissen as teaching the limitations recited in claim 1. As will be readily apparent, however, Bissen discloses a very different structure to that of the present invention. Bissen is concerned with providing a support apparatus which is used in connection with construction masts on which a crane, hinged boom or personnel lift, might be arranged. The mast support assembly is in the form of a frame-like truss which is adapted to accommodate different diameters of masts, and, is primarily concerned with the structures which allow this mast selection replacement. The truss is intended to be secured to a vertical wall, for example, a wall of a building. This is achieved through simple 'top and bottom wall anchorages 30, 32'. (See Bissen paragraph [0021]).

In contrast, the present invention is directed to providing equipment which is adapted to be fixed in a very specific environment of the hub of a wind turbine. As is well known, a hub has a hollow, shell like, form comprising circular openings at the periphery of which is arranged the bearings for the blades, between which are regions of a curved form. As is recited in claim 4, and further expanded upon in claims 6 and 7 the securing means is adapted for mounting specifically on this curved hub.

The structure disclosed in Bissen is wholly unsuited to mounting on a wind turbine hub. The structure is very specifically directed at mounting on the planar vertical

face of a wall, given the arrangement of the interface between the truss and wall at a side of the truss. There is no suggestion that the truss structure might be adapted or modified for other environments or applications; it is clearly disclosed as providing a mast support in the environment of general (building) construction.

Therefore, Applicant submits that Bissen is not a document to which a person having ordinary skill in the art of wind turbine servicing would turn, given that it is specifically directed at the problem of allowing mast replacement/selection in cranes used in the construction industry. Even if one having ordinary skill in the art were to consider this document, it does not provide disclosure of any structure applicable to or suited to mounting on the curved surface of a wind turbine hub. Thus, Applicant submits that Bissen does not teach or suggest the limitations recited in claim 4.

Therefore, Applicant submits that claim 4 is patentable over Bissen. Because claims 5, 6, 8, 10-12 and 15-17 depend from, and therefore include all the limitations of claim 4, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 4.

Rejections Under 35 U.S.C. § 103(a)

Claims 7 and 9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bissen. (See 12/02/09 Office Action p. 10). Because claims 7 and 9 depend from, and therefore include all the limitations of claim 4, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 4.

Claim 14 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Bissen in view of U.S Patent No. 6,668,497 to Mayer et al. (hereinafter "Mayer"). (See 12/02/09 Office Action p. 11). Applicant submits that Mayer does not cure the above-described deficiencies of Bissen with respect to claim 4. Therefore, Applicant submits that claim 4 is patentable over the combination of Bissen and Mayer. Because claim 14 depends from, and therefore includes all the limitations of claim 4, it is respectfully submitted that this claim is also allowable for at least the same reasons given above with respect to claim 4.

Claims 18-21 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bissen in view of U.S Patent No. 4,002,243 to Kramer (hereinafter "Kramer"). (See 12/02/09 Office Action p. 12). Applicant submits that Kramer does not cure the above-described deficiencies of Bissen with respect to claim 4. Therefore, Applicant submits that claim 4 is patentable over the combination of Bissen and Kramer. Because claims 18-21 and 23 depend from, and therefore include all the limitations of claim 4, it is respectfully submitted that these claims are also allowable for at least the same reasons given above with respect to claim 4.

Claim 22 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Bissen in view of Kramer in further view of U.S Patent No. 5,427,356 to Krotov (hereinafter "Krotov"). (See 12/02/09 Office Action p. 15). Applicant submits that Krotov does not cure the above-described deficiencies of Bissen and Kramer with respect to claim 4. Therefore, Applicant submits that claim 4 is patentable over the combination of Bissen, Kramer and Krotov. Because claim 22 depends from, and therefore includes all

the limitations of claim 4, it is respectfully submitted that this claim is also allowable for at least the same reasons given above with respect to claim 4.

**Conclusion**

In view of the above remarks, it is respectfully submitted that all the presently pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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/Richard J. Basile/

Richard J. Basile, Registration No. 40,501  
Todd M. Oberdick, Registration No. 44,268  
Attorneys for Applicant  
ST.ONGE STEWARD JOHNSTON & REENS LLC  
986 Bedford Street  
Stamford, CT 06905-5619  
Tel. 203 324-6155